

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Raul Aquino
Debtor

Raul Aquino
Movant
v.

SN Servicing Corporation as Servicer
for U.S. Bank Trust National
Association, as Trustee of the Igloo
Series IV Trust
Kenneth E. West - Trustee
Respondents

Case No.: 19-11301-elf

Chapter: 13

Judge: Eric L. Frank

RESPONSE TO DEBTOR'S MOTION TO VACATE RELIEF ORDER

SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of the Igloo Series IV Trust ("Creditor") by and through its undersigned counsel hereby objects to the Debtor's Motion to Vacate Relief Order and in support thereof avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. Denied. As of the time of filing of the instant Response, Debtor's account is due for the April 1, 2022, post-petition mortgage payment with a total outstanding fees of \$399.48, which amount is broken down as follows:

Late fees:	\$99.48
Attorney fees:	\$300.00
TOTAL:	\$399.48

7. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and it is therefore denied.

8. As of the time of filing of the instant Response, Debtor's account is due for the April 1, 2022, post-petition mortgage payment with a total outstanding fees of \$399.48, which amount is broken down in Paragraph 6, *supra*.

9. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and it is therefore denied.

WHEREFORE, Movant respectfully request that the Debtor's Motion to Vacate Relief Order be denied and for any other relief the Court deems right and just.

Dated: March 18, 2022

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com